

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Sabashtion Clayton Davis

Case No. 1:23-mj-30133  
Judge: Morris, Patricia T.  
Filed: 03-31-2023

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 30, 2023 in the county of Isabella in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 8 U.S.C. §§ 2111, Robbery

On or about March 30, 2023 in the Northern Division of the Eastern District of Michigan, within Indian country, as defined in 18 U.S.C. § 1151, that is, the Isabella Reservation, **Sabashtion Clayton Davis**, an Indian, took clothing and shoes from the person and presence of S.S., by intimidation, in violation of 18 U.S.C. §§ 2111, 1151, and 1153.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

  
Complainant's signature

Brandon Crawford, Officer, Bureau of Indian Affairs  
Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: March 31, 2023

  
Judge's signature

City and state: Bay City, Michigan

Patricia T. Morris, United States Magistrate Judge  
Printed name and title


**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brandon Crawford, being duly sworn state as follows.

1. I am an officer with the Bureau of Indian Affairs and a Mt. Pleasant Police Officer and have been a law enforcement officer since 2019. During my career I have been involved in numerous investigations. The information in this affidavit is based on my own investigation and information provided from other law enforcement officers. The information herein does not contain all of the facts known to me and is provided for the limited purpose of establishing probable cause that Sabashtion Clayton Davis committed the offense of robbery on the Isabella Federal Reservation in violation of 18 U.S.C. § 2111.
2. On March 30, 2023, officers of the Mt. Pleasant Police Department were dispatched to a residence on the Isabella Federal Reservation in Mt. Pleasant, Michigan and made contact with the victim, S.S.
3. S.S. told officers that he went to 316 Oak Street, Mount Pleasant, Michigan to visit a female friend. Affiant knows this address to be on the Isabella Reservation in Indian country.
4. When S.S. arrived two males he did not know, one with a gun and the other with a baseball bat, demanded that he remove his Air Jordan shoes, two

coats, and a belt which he was wearing and took them from him without permission.

5. S.S. complied with their demands and gave them the items they asked for. They then told S.S. to leave. As he was leaving the male with the gun tried to punch him but missed.
6. Upon investigating the incident, the police spoke with Sabashtion Clayton Davis who was believed to be one of the suspects. Upon being Mirandized Davis waived his right to an attorney and agreed to speak to the police. Davis admitted to being the suspect with the bat during the robbery. Davis also admitted that he knew the other suspect, C.A., intended to rob S.S. when S.S. arrived. C.A. told Davis to get a baseball bat and to hide in the closet until S.S. arrived which Davis did. Prior to entering the closet C.A. gave Davis a neck gaiter to wear as a mask which he did. Davis told police that he came out of the closet with C.A. once S.S. was there. Davis said C.A. pointed a gun at S.S. and told S.S. to give him everything he had. Davis admits standing close to S.S. while holding the baseball bat. Davis further admitted that clothing and shoes that S.S. wore were taken from S.S.
7. Upon being booked into the jail, it was discovered that Davis is Native American and that he receives services from the Nimkee Clinic in Mt. Pleasant, therefore Affiant knows that he is Indian.

A handwritten signature in black ink, appearing to read "Brandon Crawford", written over a horizontal line.

Brandon Crawford, Affiant  
Officer, BIA

Sworn to before me and signed in my presence a  
nd/or by reliable electronic means  
on March 31, 2023.

A handwritten signature in blue ink, appearing to read "Patricia T. Morris", written over a horizontal line.

HON. PATRICIA T. MORRIS  
United States Magistrate Judge